MEETING SUMMARY

GE EVENDALE – RCRA CORRECTIVE ACTION PROGRAM

DATE	Thursday, November 1, 2016
TIME	3:00 PM EDT
LOCATION	Conference Call
SUBJECT	USEPA-GE Call: Development of Risk Based Soil Cleanup Goals, GE Evendale OH Facility
ATTENDEES	USEPA Region 5: Todd Gmitro, Mario Mangino GE – Ed Kolodziej OBG – Rick Boone, Doug Crawford, Mike Rondinelli Burns & McDonnell – Scott Cormier

A conference call was held on November 1, 2016 between GE and USEPA to discuss USEPA's comments on GE's methods for developing risk-based remediation goals and general approach to soil cleanup at GE's Evendale Ohio facility, as described in the July 2015 Soil Pathway Interim Report.

The call agenda focused on the derivation of risk-based soil cleanup goals and preliminary comments provided by Mario Mangino of USEPA following a meeting in September 2016. USEPA and GE agreed that redline updates to the Soil Pathway Interim Report and I&EC Plan, incorporating additional information as discussed below, would be included as appendices to the CMS Report when submitted to USEPA.

Discussions centered around two key discussion points:

1. Rationale and approach to background metals concentrations

USEPA's questions and discussion focused on (1) clarity in the Soil Pathway Interim Report regarding background characterization of metals in the soil during the RFI, and (2) details on the applicability of the 2005 Ohio EPA study of background metal concentrations in Hamilton County soils.

GE elaborated on the RFI data collected and associated depth and number of background samples. GE provided further details on the number and locations of soil samples collected in the Ohio EPA study. It was concluded that the revised Soil Pathway Interim Report will include additional information and rationale describing the appropriateness of the Ohio EPA background study to provide support for making corrective action decisions.

2. Appendix B – review of site-specific input values

The meeting agenda identified three primary areas of discussion:

- Calculations and site-specific input values using the RSL Calculator
- Areal extent of potentially affected soil (A_s)
- Risk screening approach for total petroleum hydrocarbons (TPH)

USEPA questions and discussions focused on different soil cleanup values obtained using the RSL calculator and input parameters provided in Appendix B of the Soil Pathway Interim Report. In addition, there were questions and comments related to the calculation of TPH screening criteria and consideration of a carcinogenic endpoint given that TPH is a mixture of organic compounds, some of which may elicit carcinogenic effects.

Regarding the discrepancy in the soil remediation goal values, GE indicated that it would conduct an additional review of its input parameter values for TCE provided in Appendix B. GE and USEPA agreed that USEPA would provide a copy of the RSL Calculator input values and results for further review and discussion, if needed. It was agreed that for chemicals with highly volatile properties (e.g., TCE), that the inhalation component of the risk-based cleanup goal should utilize a soil volatilization factor (VF), and that the dust component which incorporates a particulate emission factor (PEF) would contribute negligible risk. It was also agreed that rather

than using the facility size (400 acres), the value for A_s will be modified to include the combined total of the areas of the individual SWMUs/AOCs.

With regard to the development of TPH screening criteria and cleanup values, GE's approach to derive a soil remediation goal for TPH was to use the most conservative RfD and RfC available for the six TPH fractions. USEPA acknowledged that the TPH non-cancer dose calculation was adequate. It was agreed that GE will provide further site-specific information on waste types and benzene concentrations in soil to justify the appropriateness of GE's approach. GE will also further explain the basis for potentially different receptor exposure scenarios in the SWMUs/AOCs, with additional details to be provided in the revised I&EC Plan.